

**The “Environmental Stewardship”
A new approach to agri-environment in England**
Ein neuer Ansatz für Agrar-Umwelt Programme in England

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List of abbreviations

BAP	Biodiversity Action Plan
CAP	Common Agricultural Policy
CS	Countryside Stewardship
DEFRA	Department for Environment, Food and Rural Affairs
EAGGF	European Agricultural Guidance and Guaranty Fund
ELS	Entry Level Stewardship
ERDP	England Rural Development Programm
ES	Environmental Stewardship
ESA	Environmental Sensitive Areas (means both the scheme and the areas)
FEP	Farm Environmental Plan
FER	Farm Environmental Record
FWAG	Farming and Wildlife Advisory Group
GAP	Good Agricultural Practice
HLS	Higher Level Stewardship
IoS	Indicators of Success
JCA	Joint Character Areas
OELS	Organic Entry Level Stewardship
PO	Project Officer
RDS	Rural Development Service
RSPB	Royal Society for the Protection of Birds

1 Abstract

English:

The former agri-environment schemes in England were the Environmentally Sensitive Areas (ESA) and the Countryside Stewardship (CS). The ESA was aiming at maintenance of landscape and wildlife within 22 target areas. CS was orientated to enhance landscape and wildlife outside the ESA. After the crisis of Foot and Mouth in 2002, the Government decided to devise a new agri-environment scheme, the Environmental Stewardship (ES). The scheme is based on findings from the old schemes' evaluation. The Department for Environment, Food and Rural Affairs (DEFRA) offers the scheme since the 3rd of March 2005.

ES is made up of two layers. The first is the Entry Level Stewardship (ELS), which is open to farmers all over England and offers payments for easy conservation works. The Higher Level Stewardship (HLS) finances more demanding measures in more valuable landscapes and habitats. For organic farmers there is the Organic Entry Level Stewardship (OELS), which rewards them with higher payments. Farmers choose from a management catalogue work options that they want to carry out and they offer them to DEFRA.

For ELS, all applicants will be accepted. DEFRA expects the ELS to reach a high uptake with 70-80% of all agriculturally used land being brought into the scheme. Structure, application and administration are simple. Nevertheless, ELS offers a comprehensive set of 60 options aiming at landscape and wildlife enhancement and resource protection. Each option has a certain number of points and the farmers must choose options so that the point score amounts to 30 points per hectare of the holding. Without further checks, farmers receive a flatrate payment of £30 per hectare over the whole holding. The agreements run for five years.

In HLS only the farms with the highest conservation value receive a management contract. England is divided up into 159 Joint Character Areas with different landscape characteristics and objectives. The better applicants can contribute to achieving the objectives in their area, the higher is their chance to be accepted. To facilitate the choice of options and to enable DEFRA to pick out the best applicants, a Farm Environment Plan must be prepared. This is done by an independent conservation adviser. The agreements are individually tailored to the farmers situation by a state adviser. Agreements consist of obligations and Indicators of Success. The indicators tell the farmers what they are supposed to achieve with the management and whether they succeed in it. The payments do not depend on the indicators.

The scheme was devised with participation of representatives from farming and conservation associations. Both sides are generally happy with the scheme, even if different aspects, such as the targeting and the advice are worth a discussion. Conservationists appreciate the whole farm approach and farming representatives like the great choice of options and the simple system of ELS. Especially ELS is an innovative idea, which may contribute to change the farmers environmental awareness, as it will reach many more farmers than the old schemes. The HLS is a progressive scheme with regard to targeting, efficiency, comprehensiveness of the options, success orientation, advice and flexibility of the agreements. Hence it can be expected to bring about a great benefit for conservation. However, the scheme is very complex and can only work with the help of conservation advisers.

In 2004, DEFRA payed £194 mil for agri-environment schemes. In the next years the sum will increase up to £300 mil. (appr. 450mil. €). The modulation is 10% in Britain.

German:

Die ehemaligen Agrar-Umwelt Programme in England waren das Environmentally Sensitive Areas (ESA) und das Countryside Stewardship (CS). Ziel des ESA war der Erhalt von Biotopen und Arten in 22 Zielgebieten. Das CS zielte auf Entwicklung von Natur und Landschaft außerhalb der ESA. Nach der Krise der Maul und Klauenseuche 2002 beschloss die englische Regierung ein neues Agrar-Umwelt Programm zu entwickeln: Das neue Programm heißt Environmental Stewardship (ES) und es wurde unter anderem auf der Grundlage der Ergebnisse der Evaluation der alten Programme entwickelt. Dieses wird seit dem 3. März 2005 vom Department for Environment, Food and Rural Affairs (DEFRA) angeboten.

Das ES ist ein zweistufig Konzept. Das Entry Level Scheme (ELS) ist für alle Landwirte offen und honoriert einfache Naturschutzleistungen. Das Higher Level Scheme (HLS) finanziert aufwändigere Maßnahmen auf wertvollen Flächen. Es gibt für Bio-Landwirte ein Organic Entry Level Scheme (OELS), in dem sie für ähnliche Arbeiten besser bezahlt werden. Landwirte wählen aus einem Management-Katalog Naturschutzarbeiten aus, die sie auf ihrem Hof umsetzen möchten. Mit dieser Auswahl bieten sie DEFRA eine Naturschutz-Dienstleistung an.

Für das ELS sollen alle Bewerber angenommen werden, und DEFRA rechnet damit, dass etwa 70–80% der landwirtschaftlichen Nutzfläche in das Programm eingebracht werden. Programmstruktur, Bewerbung und Verwaltung sind simpel. Dennoch bietet ELS mit Zielsetzung auf Ressourcen-, Arten- und Landschaftsschutz eine umfangreiche Auswahl von 60 Maßnahmen an. Jede Managementoption hat eine gewisse Punktzahl. Je Hektar Hoffläche müssen Bewerber Maßnahmen für 30 Punkte wählen. Sie erhalten dann ohne weitere Hofprüfung pauschal £30 (45€). Verträge laufen fünf Jahre.

Für das HLS bekommen nur die naturschutzfachlich wertvollen Betriebe einen Managementvertrag. Um diese zu ermitteln ist England in 159 Landschaftsräume mit Naturschutzzielen eingeteilt. Je besser ein Bewerber zur Zielerreichung beitragen kann, desto wahrscheinlicher ist seine Aufnahme in das Programm. Zur Bewerbung gehört eine Hof-Biotopbewertung, die dem Bauern die Managementwahl erleichtert und der Verwaltung die Auswahl der besten Höfe ermöglicht. Dieser Plan wird meist von freien Naturschutzberatern angefertigt. Die Verträge werden in Diskussion mit den Landwirten erarbeitet und sind auf die jeweilige Hofsituation angepasst. Sie bestehen aus Auflagen und Erfolgsindikatoren. Die Indikatoren vermitteln dem Landwirt, was er mit der Landschaftspflege erreichen soll und ob sich der gewünschte Erfolg einstellt. Zahlungen sind nicht daran gekoppelt.

Das Programm wurde unter Mitarbeit von Landwirtschafts- und Naturschutzvertretern entwickelt und es gibt von keiner Seite grundsätzliche Kritik, auch wenn einige Aspekte, wie z.B. die Zielgerichtetheit oder die Beratung noch Diskussionsbedarf aufwerfen. Bauernvertretern gefallen die einfache Verwaltung und die große Auswahl, Naturschutzvertretern der gesamtbetriebliche Ansatz. Insbesondere ELS ist eine innovative Idee, die zu Bewusstseinsänderung der Landwirte beitragen kann. Das HLS stellt in Bezug auf Zielgerichtetheit und Mittel-Effizienz, Umfassendheit der Maßnahmen, Erfolgsorientierung, Flexibilität der Verträge, Beratung der Landwirte und demzufolge zu erwartender Naturschutzerfolge ein sehr fortschrittliches Programm dar. Allerdings ist dieses Programm recht komplex und nur mit Hilfe von Naturschutz-Fachberatern zu verwirklichen.

2004 verteilte London £194 Millionen für Agrar-Umwelt Maßnahmen an die Bauern, in den nächsten Jahren werden es ca. £300 Millionen (ca. 450 mil. €) jährlich werden. In Großbritannien beträgt die Modulation 10%

2 Introduction

In March 2005 the Department for Environment, Food and Rural Affairs (DEFRA) launched a new agri environment scheme, the Environmental Stewardship (ES). It appears to be a very progressive approach to agri-environmental issues and it may well stand as a good example for further development of schemes in other countries. This work provides the background of the previous schemes and explains and comments on the new scheme. ES consists of two main parts. The first part is the Entry Level Stewardship (ELS) – with its sub part Organic Entry Level Stewardship (OELS) - which is an easy to administer scheme available for all farmers that rewards simple environmental management with a flatrate payment. The second part is the Higher Level Stewardship (HLS) where farmers compete for funding for higher targeted environmental performance.

Due to the actuality, it was not possible to obtain all desirable data on all required issues. Especially for the issues funding, outcome orientation, advice and controlling much of the information was not yet available in written form. The DEFRA staff seemed to be very stressed through the time pressure of the launching process. Nevertheless, many were willing to help and so a lot of the contents base on oral inputs. Therefore, there may be facts in this work that could not be embraced comprehensively.

Part 1 – Agri-environment schemes before 2005

The history and the principle of the former schemes is explained in order to enable the readers to judge the importance which agri-environment schemes have had in England and to display the starting point of the new schemes. To better understand how the new Environmental Stewardship came to be what it is today, an evaluation and recommendations from the most recent review of the agri-environment schemes is given. These have served as a background for the development of the new Scheme.

3 The historical context of the old schemes

The agri-environment schemes were primarily developed as a response to the impacts of a changing agriculture on valued landscapes, habitats and species. After the 1940's intensification through mechanisation, the introduction of new techniques, farm amalgamation and specialisation, and the use of agrochemicals increased. The Common Agricultural Policy (CAP) of the European Union contributed to boost the intensification by providing payments as incentive for production. The agricultural changes had a lot of detrimental consequences. Landscape features and semi-natural habitats were destroyed on a large scale, the abundance and range of invertebrates, weeds and farmland birds was reduced, the overall fertility of habitats increased and thus species richness decreased, watercourses and ground water were polluted and historical sites were destroyed. (ECOSCOPE 2003)

The first British agri-environment scheme was developed in 1985 after the introduction of EEC Council Regulation 797/85. The Regulation permitted Member States to provide funding for agricultural production practices, which contribute to conserving the natural habitat. The scheme was limited to the Broads Grazing Marshes and aimed to halt an increase in drainage works and encourage farmers to restore pastoral farming. This scheme had an uptake of 90%. On the basis of this success, the Environmentally Sensitive Areas Scheme (ESA) was introduced with five targeted areas in 1987. The objective of the scheme was to maintain valuable landscape, wildlife and historical interest within the designated areas of national importance. (ibid.)

In 1990 the government felt the need to develop a new conservation approach. In 1991 the Pilot Countryside Stewardship Scheme (CS) was launched, a scheme which should encourage farmers outside the ESAs to “*conserve, enhance or re-create [and not only maintain] important landscape types.*” (ibid., 28) It differs from the ESA furthermore in that it is proactive: positive payments are made for new activities. And it is competitive, that means that only the best farms in terms of landscape value are offered an agreement. (STONEX, 1996). The Pilot scheme lasted until 1996 and was then continued as a regular scheme (ECOSCOPE 2003).

In 1992 the “Agri-Environment Regulation” (EC) No 2078/92 was introduced, a mandatory Regulation to make Member States introduce incentives for farming practices compatible with the requirements of environmental protection and maintenance of the countryside. The government introduced another 12 ESAs in 1993 and 1994.

Yet, Britain with its existing schemes was apparently chronologically ahead of the Regulation. Also with regard to the quality, Britain's approach was more sophisticated, as it included a monitoring requirement (ECOSCOPE 2003). These facts allow the assumption that Britain was one of the driving forces of the Regulation (EC) No 2078/92 and pushed to develop agri-environment schemes in Europe.

In March 1999 the reform of the Common Agricultural Policy (CAP) Agenda 2000 was agreed. The most important change with regard to agri-environment was that a new financial framework, the so called “second pillar” of the CAP, was established. This allowed the rural development to be co-funded by the Guarantee section of the EAGGF fund. A part of the former direct agricultural support was re-directed into the second pillar (modulation). The measures for which the funding is available is regulated in the Rural Development Regulation (EC) No 1257/99. In England the Regulation was implemented through the England Rural Development Programme (ERDP). (ibid.) It is a seven year lasting programme consisting of ten schemes, of which two are the ESA and the CS (DEFRA 2003a). As with Regulation 2078/92, Britains schemes exceeded the provisions of the regulation 1257/99, as they offer payments on pollution controll, set aside and public access. (ECOSCOPE 2003)

4 Environmentally Sensitive Areas (ESA)

4.1 Objectives

The original objective of ESA was restricted to maintain landscape and wildlife interest value, and all areas had the same general overall aim. In 1991/92 the scheme was reviewed. The scope extended to aim for enhancement as well as maintenance and the historic interest was explicitly recognized. Now, each designated area has its individual objectives. (ECOSCOPE 2003) The objective of the ESA “Somerset Levels and Moors” for instant, is to *“protect and, where possible, enhance the wet permanent grassland (...) and its special landscape, wildlife and historic interst, by encouraging the maintenance and adoption of extensive pastoral farming systems.* (DEFRA 2002a).

4.2 Structure

There are 22 ESAs existing, covering the nations most valuable landscapes with different objectives and prescriptions to follow. Farmers can enter land within the ESA boundaries into a ten years lasting agreement with DEFRA and receive annual payments on the hectares of land. Each ESA has different tiers into which land of certain type can be entered. Higher tiers require a more demanding management to achieve greater environmental benefits and result in higher payments. In some ESAs farmers can choose which parts of their farm they want to bring into the scheme, others are planned as whole farm schemes. The tiers are often aiming at one type of landscape only. So the scheme is less comprehensive but more targeted than CS. However, in ESAs, farmers can apply for CS, too, if the management options which they apply for are not offered under ESA. In addition to the management obligations, the farmers can apply for grant aid to carry out particular one-off capital work. For this purpose they must provide a schedule of planned capital works that they agree to carry out over a set period (conservation plan). Both the acceptance into the scheme and the approval of the conservation plan is at the departments discretion. (DEFRA 2002b)

4.3 Annual management options

The options a farmer agrees with DEFRA depend on the tier, he can enter his land in. In the following, the ESA “Somerset Levels and Moors” is used to illustrate the principle. It is an open flood plain with waterlogged peat soils in the southwest of England. Available payment is limited to grassland options. (DEFRA 2002a) Farmers can opt for four tiers. The tiers have prescriptive management obligations. On all land entered into any tier, certain aspects of land management must be complied with: Landscape features must be managed positively, no

herbicides must be applied other than in exceptional cases and the code of Good Agricultural Practice (GAP) must be followed. (DEFRA 2002b)

Tier 1 (Permanent Grassland, £125/ha) is a pure maintenance option with classical grassland stipulations at the level of GAP. The following tiers base on tier 1 and have supplementary provisions: Tier 1A (Extensive Permanent Grassland, £200/ha) requires additional reduction on fertilizing and a later cutting date. Tier 2 (Wet Permanent Grassland, £225/ha) aims at enhancing wet grassland through higher ditch water levels in summer and for tier 3 (Permanent Grassland in Raised Water Levels Areas, £430/ha) the water level must be higher and provide splashing conditions during the winter and spring. No application of fertilizer is allowed. For the Buffer Strip Supplement (£110/ha) the application of inorganic fertilizer must be ceased on a 6 metre strip adjacent to all boundaries of fields under agreement. The All Year Penning Supplement on Peat Soils (£18/ha) and the Raised Water Level Area Payments (£80/ha) provide for possibility to combine the lower tiers with additionally raised water levels. (DEFRA 2002a)

On average through all ESA management options, payment rates are quite low. Almost two third of ESA rates are set below the calculated income forgone level. (ECOSCOPE 2003).

5 Countryside Stewardship Scheme (CS)

5.1 Objectives

As mentioned above, the CS' aim is stronger orientated to enhance and re-create landscape and wildlife interest value, than the ESAs' is. The scheme objectives are to

- *“sustain the beauty and diversity of the landscape;*
- *improve and extend wildlife habitats;*
- *conserve archaeological sites and historic features;*
- *improve opportunities for countryside enjoyment;*
- *restore neglected land features; [and] create new habitats and landscapes where appropriate”.*

(DEFRA 2003b, 3).

All over Britain, but only outside the ESAs, the scheme aims at the following landscape types and features:

Arable farmland	Lowland heath
Chalk and limestone grassland	New access
Coastal areas	Old meadows and pasture
Countryside around towns	Old orchards
Field boundaries	Uplands
Historic features	Waterside land.

For each of these, the scheme defines objectives. (DEFRA 2003b)

In order to allocate the limited budget efficiently, there are specific targeting statements for each county. Landscapes that have a higher natural interest value or are exposed to threat are selected as “target areas”. These are the priority areas for funding. For each of these areas objectives define what CS agreement holders should achieve. Applicants whose farm is in a target area and who propose to fulfil some of the objectives have better chances to be offered an agreement. However, this neither precludes applications from outside target areas, nor single interest applications, that meet only one of the objectives. The target areas can be very extensive. In case of Somerset, they cover about 45% of the county. (DEFRA 2002c)

5.2 Structure

Farmers apply for an agreement to DEFRA. The application, which is often drawn up by an adviser, consists of text and map. It briefly describes the farm, explains how the scheme objectives would be achieved, what management and capital work shall be carried out and which costs would be claimed. (MILLS, 2004). For a series of more comprehensive enhancement and re-creation works, management plans are required. To decide which applicants will be offered an agreement, all applications are assessed on the benefit they provide for the countryside. The selected farmers will be visited by a local DEFRA-adviser, who discusses the application with them and may ask to alter it. If both parties agree on the application, the farmer will receive a ten year agreement. Eligible work falls into four categories:

- Annual management items, which are to be chosen from a national set of options
- Supplements for additional work over and above the standard management options
- Capital items: One-off works, such as restoration or creation of landscape features
- Special projects for work that fits in none of the above

(DEFRA 2003b)

5.3 Annual management options

As with ESA, the farmers have to comply with good farming practice on the whole farm. However, requirements as to sympathetic management of field boundaries and cultivation on all land under agreement, are more far-reaching, and comprise provisions for which there is funding available under ESA. (ibid.)

Each of the in 4.1 mentioned landscapes and features has a set of management options with payment rates that may be chosen for a farm. The management options are a guidance baseline on which the Stewardship-adviser will discuss the agreement with the farmer (DEFRA 2003b). They are prescriptive but flexible and try to consider the farmer's needs. They explain what the management aims for and give the farmer some indication, whether or not his management achieves the objectives. In this respect, they are more progressive than the ESAs prescriptions.

Additionally, as with ESA, farmers can choose one-off capital work items that must be layed down in capital works plan for the whole time of the agreement. (MILLS 2004)

6 Uptake and expenditure

In 2003 there were 27.500 farmers (12.500 ESA, 15.000 CS) with over 1.015.000 ha farmland in the schemes (615.000 ESA, over 400.000 CS) (DEFRA 2004a) This is about 11,0% of the total of 9.177.390 hectare of agriculturally utilized land in England (DEFRA 2003c). CS has proved to be popular and was regularly over subscribed and uptake increased especially after 2000 (ECOSCOPE 2003). In the 2002/2003 financial year, agreement holders were payed just over £105 mil.. Devided by the above mentioned number of hectares, it mounts up to £103,44 per hectare land under contract. The £105 mil. consisted of each £41 mil. from EU contribution and exchequer matched funding, respectivaly, and £23 mil. additional state aid. £53 mil. was given to ESA and £52 mil. to CS agreement holders. £81 mil. was for annual land management and £24 mil. for capital works. (DEFRA 2004a) The total expenses for agri-environment in 2002/2003 amounted to £137.6 mil. with the remaining £35,6 mil. going into the Organic Farming Scheme. (DEFRA 2005h). To compare these figures with Germany, see Chapter 12.1.

7 Evaluation and recommendations

The assessment of the two schemes must be seen in the context of their difference. ESAs are supposed to protect some of England's most valuable habitats and landscapes, so that their emphasis is on maintenance of existing value. CS is far wider available, and by reading prescriptions and payments attentively, it becomes obvious, that here applicants must offer higher performance for slightly less money.

The most recent monitoring dates back to the "Review of agri-environment schemes" in 2003 (ECOSCOPE 2003). The following statements are taken from this work. Performance monitoring of agri-environment schemes is generally difficult and the findings may therefore seem vague. Furthermore, the two schemes were monitored in a different way. This makes comparisons difficult.

In most ESAs the uptake of the scheme is high. The majority of the land is entered into tier 1, which has the lowest management obligations. ESAs have had a significant success in preventing the loss of valuable habitats to agricultural improvement and a main benefit of the scheme is the conservation of large contiguous areas of high ecologic value. Presently, pressure for agricultural intensification is reduced and ESA land would in many cases probably not be managed differently without the scheme. Hence, the additionality of the scheme is not sure. Low uptake in the more demanding higher tiers result in that habitat enhancement and restoration is limited.

The CS achieves a high degree of accomplishing its aims of maintenance and enhancement. 70% of the sample agreements are likely to maintain and enhance wildlife values, with the highest level of predicted success in arable margins, field boundaries, coastal habitats, waterside land and lowland heathland. The scheme review has difficulties to show the direct achievements of CS. It is emphasised that already by the end of 1997 large proportions of different BAP Priority Habitats (Biodiversity Action Plan, the UK habitat and species conservation programme) were under CS agreement. However, none of the schemes could so far halt the decline of most taxa groups on farmland habitats.

Even though assessing of landscape quality depends on individual perception, it is certain that the ESA has contributed to maintain landscape quality. Significant enhancement has also occurred, as some ESAs have increased the quantity of certain landscape features. In some cases, additionality can be proved. The CS appears more successful in maintaining valuable landscapes, than the ESA.

The schemes are the main contributors to the maintenance of the historic environment in the English countryside. Compared with non-agreement land, the level of damage on ESA land is lower because positive management has been implemented in many cases. There is only limited evidence of enhancement, stemming mainly from arable reversion to grassland and absence of ploughing. The CS is likely to achieve its historic and archaeological objectives. Roughly 70% of agreements contain archaeological objectives. In two thirds of cases, the work would not have been put into practice without the CS.

Although no monetary benefit evaluation was conducted, the review states that both schemes provide good value for public expenditure. As a tendency, the CS is more firmly based on the environmental gain that it procures. For the ESAs, the high uptake of the lower tiers is of concern: the management that the farmers are payed for may have been carried out without agreements, too. So, the money may sometimes have been badly deployed.

Recommendations included the following:

- The greatest limitation on the achievements of the schemes objectives is the level of funding. It is insufficient to allow all applicants into CS and provide satisfactory uptake in the higher ESA tiers. An overall increase would be appropriate.
- The area concentration of the ESAs has positive impact on species, due to the island biogeographic effects. This principle must be retained. CS agreements are often widely scattered. Here, either the uptake must be increased considerably, or careful targeting could help.
- The low uptake of higher tiers in ESA and some CS options may often be a result of farmers attitudes. They perceive especially the ESA as too restricting, and they are reluctant to move away from a production orientated agriculture. More flexible, locally adapted schemes, awareness campaigns and promotion may contribute more to higher uptake, than higher payments would.
- It is positive, that CS agreements are very flexible. However, as this requires advice given by DEFRA staff, the success of each agreement depends strongly on the approach and the knowledge of the Project Officer. New research findings must be integrated into the scheme reviews, and the staff must receive regular training.

Part 2 - The Environmental Stewardship from 2005

This main part lays down the occurrences that lead to the development of Environmental Stewardship. It then explains the overall principle and structure and for each scheme its objectives, structure, application process and management options. Following this, some common aspects are explained, of which the funding is the most important. At last, a comprehensive list of comments is given and the work ends with an appraising conclusion.

8 Evolution of the new schemes

The new agri-environment scheme “Environmental Stewardship” took its starting point in the trauma of the Foot and Mouth Disease. The disease threw the economically already weakened agriculture into a crisis and was the trigger that the public and the policy realized the problems of the farming industry. As problems were identified that most farmers faced a harsh economic situation, intensive agriculture led to environmental destruction, many consumers were scared about health and safety of food and consumers nutrition standards were poor (AGRITRADINGNET 2005).

In 2001 the Government appointed the Policy Commission on the Future of Farming and Food, after the chairman Sir Curry often referred to as Curry Commission. The remit was to “*advise the Government on how we can create a sustainable, competitive and diverse farming and food sector which contributes to a thriving and sustainable rural economy, [and] advances environmental, economic, health and animal welfare goals (...).*” (CURRY et al. 2002, 5)

The report was finished in January 2002. It criticised the low rate of payment for rural development of 3,5% of the first pillar and recommended to raise modulation to 10% or, if no substantial CAP reform would be delivered, to 20%. Among numerous recommendations, the report dealt with the future of the agri-environment schemes. Praising the success of the old schemes, they were felt to be too complex, with high running costs and effective merely in targeted areas. They should be simplified, the overhead reduced and in addition to the existing principle, a new broadly based and shallower targeted approach should be developed. A new two-tiered system was recommended: The new basic entry level scheme should be open to all land managers. It would have to be simple and reasonable to administer with a set of nationwide whole farm targets. The preparation of a whole farm environmental record was suggested to be the prerequisite to take part. Management options and obligations should be just beyond GAP level. Every farmer should be able to choose suitable management options and then receive a flat rate payment per hectare. To further organic farming, a separate entry level scheme for organic farmers was recommended. This should complement a scheme to assist farmers with converting their farm to organic practice (which was introduced in June 2003 as the Organic farming scheme under ERDP). One upper scheme should replace the CS and ESA. It should work largely as the CS but targeting and options should be reviewed. As baseline assessment and to enable targeting, a detailed audit on natural resource protection and conservation in the form of a farm environment plan was recommended. (CURRY et al. 2002)

To implement the recommendations, the Government launched the “Strategy for Sustainable Farming and Food” in December 2002. The Entry Level Stewardship should be piloted and thereafter start nationally in 2005. The existing schemes should be improved in terms of better targeting and made simpler to applicants. (DEFRA 2002d) Directly following the launch of the strategy, consultations with all relevant stakeholders started (DEFRA 2003d) and the pilot scheme was launched in 2003. It ran in four areas with different landscape and farming

requirements. The monitoring found out that it was supported by the majority of participants (97%) and non-participants (67%), and 70% of the farmers felt it was important for wildlife. A majority of farmers stated, that they had not carried out the required management before, and would even carry on with it if they left the scheme. (BOATMAN et al. 2004). The report recommended a lot of alterations, most of which were taken into account.

In March 2005, the new Environmental Stewardship (ES) was launched.

9 Overall structure

The scheme consists of three elements: The Entry Level Stewardship (ELS) with its sub-scheme Organic Entry Level Stewardship (OELS) and the Higher Level Stewardship (HLS).

The idea is closely related to the Curry-recommendations (see chapter 8) The principle behind the scheme is that farmers are free to choose their positive management from comprehensive catalogues and hence “offer” the government a service. In the application documents they have to describe their land and to propose which management they are willing to commit themselves to. In ELS the management options have certain points and farmers must gather options with a total of 30 points per hectare farmland. Without much more administration effort, they are being payed on a flatrate basis. ELS is principally open to all farmers, provided they meet some simple pre-requisites regarding ownership, registration, etc.. ELS is planned to be simple and easy understandable in terms of the application process and administration expenditure.

Farmers who want to apply for HLS must participate in ELS, too, and the two schemes will be combined into one agreement. HLS is discretionary. This means that all applications go through an assessment procedure and only the best are accepted. HLS is characterised through flexible locally adaptable and advice focussed agreements, regionalised targeting, outcome orientation and reviewed management options.

For both the overall funding is planned to be increased and awareness campaigns among farmers are carried out. Detailed handbooks inform about each of the three parts of the scheme and later become legal part of the contract. (DEFRA 2005b, c)

10 Entry Level Stewardship and Organic Entry Level Stewardship

10.1 Objectives

ELS/OELS aims to make a great proportion of all farmers across England “*deliver simple yet effective environmental management that goes beyond the Single Payment Scheme (SPS) requirement to maintain land in Good Agricultural and Environmental Condition*” (Cross-Compliance conditions). If it will cover wide areas of the countryside, it will contribute to

- *Improve water quality and reduce soil erosion (...)*
- *Improve conditions for farmland wildlife (...)*
- *Maintain and enhance landscape character (...)*
- *Protect the historic Environment (...)*

(DEFRA 2005b, 6)

10.2 Structure

Out of a set of 60 positive management options, applicants can choose what suits their farm best. With the application documents, the farmers receive guidance notes called “*ELS: making*

the most out of your options”. They identify characteristics of the landscape, wildlife and historic features and explain which options would deliver particular benefit for the applicant’s land. The notes are meant to support the farmer in his choice and they are not binding. Each option has a certain number of points (see Appendix 1). ELS is a whole-farm scheme. Land managers have to allocate options counting for 30 points per hectare over the whole farm. The whole farm in this respect is all land registered with the Rural Land Register, and has nothing to do with where “first pillar payments” are claimed. Farmers will then be payed £30/ha each year. Agreements last for five years. (DEFRA 2005b)

OELS is a separate scheme to give greater benefit to organic farmers. Farmers who have all or part of their land under organic management can enter the scheme. The set of options they can choose from is slightly changed, as some options are not suitable for organic farming. The points target for organic land is 60 points/ha and the payment £60/ha. However, when choosing the management options, they accomplish 30 points only for applying organic management. As they do this anyway, they effectively only have to allocate options with 30 points on each hectare of organic land. Therefore they actually have a point target of only 30 points/ha but receive payments of £60/ha. If farmers have both organic and conventional land, they receive one agreement where they enter organic land under OELS conditions and conventional land under ELS conditions. The scheme offers also conversion payments for 2-3 years, accounting for £175/ha and £600/ha, although compared with aid under the Organic Farming Scheme, these are low. (DEFRA 2005c)

10.3 Application process

On request farmers receive the application documents from the Rural Development Service (RDS), the department within DEFRA that is responsible for the rural development. The documents they have to submit consist of two maps and a form. One map is the Farm Environmental Record (FER). This map must display all landscape features on the holding. It is meant as a baseline stocktaking. The second map is the options map. The form contains the farmer’s details and shows the options the applicant offers to carry out.

To help farmers with their application, they will receive four things:

- a 112 pages thick ELS Handbook, which gives them all relevant information about ELS and will later be legal part of the agreement;
- a pre-filled map and a corresponding data sheet with all their land registered in the Rural Land Register (land is only eligible for the scheme, if registered); Farmers must make sure that all their registered land is displayed on the map and the sheet.
- an Environmental Information Map with information from authorities about features on the farm, for instance hidden archaeology, protected areas and findings of environmental surveys;
- the guidance note “*ELS: making the most out of your options*” telling them which options might be most appropriate for their area.

First step for applicants is to mark all landscape features of the farm on the FER map. In addition the land holders must mark all fields with risk of soil erosion. A simple discription in the handbook shows how to identify such fields. All farmers have to agree to retain the features listed in their FER for the life of their agreement. In return they obtain three points per hectare to prepare the FER. (DEFRA 2005b)

Now they must choose the options and mark them on the options map. When choosing the options, farmers must make sure that the point score for the whole farm at least 30 points per hectare. Finally, the options are recorded on the form and the options map. (ibid.)

After farmers have submitted their application, no further verifications are carried out. The applicant will receive a letter confirming that he/she is accepted into the scheme, with the start date and the annual payments. Furthermore the options with the maps are returned. For all further details the handbook becomes legal part of the contract. (ibid.)

ELS was announced to be so simple that farmers could complete applications themselves. However, when talking to conservation advisers, it became obvious that some farmers still feel overtaxed with it and need assistance. For this they have to consult with and pay a conservation adviser (see also 11.2). (THORNE, 2005, oral)

10.4 Options

The range of options the farmer can choose from is very wide (see Appendix 1). They are arranged in groups, such as options for field boundaries or for grassland. Farmers can choose freely from the groups without restrictions that options from any group must be represented on any farm. Most options are for annual management. There are rotational options, meaning that they will move location from year to year. Four provide for the preparation of a management plan (e.g. for nutrition management). Capital one-off work is not available. The options apply all the same for the whole of England and no targeting as to different landscapes exists. The management is not very demanding. It may already be part of the normal practice, (e.g. ditch management, 24 points per 100 m) or comprise only slightly stronger efforts. (DEFRA 2005b) As the pilot scheme monitoring showed, there are considerable differences as to how easy it is to fulfil the point score. In areas with a lot of landscape features, it is very easy with only a few different options. In intensively cropped areas, farmers will have to make use of many options and change their management more. (BOATMAN et al. 2004) In this way farmers are rewarded, who are working in a more variable landscape, where farming is often harder.

11 Higher Level Stewardship

11.1 Objectives

HLS has five primary objectives:

- *Wildlife conservation*
- *Maintenance and enhancement of landscape quality and character*
- *Natural resource protection*
- *Protection of the historic environment*
- *Promotion of public access and understanding of the countryside.*

And two secondary objectives, which were not contained in CS and ESA:

- *Flood management*
- *Conservation of genetic resources*

(DEFRA 2005d, 6)

To increase the scheme's efficiency and direct payments to where they are best deployed, regional targeting, similar to the CS, is used (see chapters 11.2 and 11.3).

11.2 Structure

HLS is a part farm scheme, as only certain valuable land is entered. Farmers choose management options from a catalogue and receive payments per unit (see Appendix 2). The set of options is more comprehensive than in CS and the most recent research has been incorporated. The scheme provides for a wide range of capital works. Agreements will last 10 years, with possibility for both parties to opt out after five years.

To gather information for the HLS application, the Farm Environment Plan (FEP) must be prepared. It is a detailed description and evaluation of the farm's landscape and natural features. Targeting is a very important part of HLS to assure that the money is spent with the most possible benefit. Compared with CS it is improved in that it covers the whole of England and is much more detailed. Regional targeting statements provide the RDS Project Officer (PO) with criteria which farms should be selected for the scheme and they give the farmers indication whether or not their farm has a chance to be accepted.

HLS aims on achieving outcomes and not only on following prescriptions. Instruments for this are the "Indicators of Success". They make farmers understand what they should achieve and give them a sense for what they are supposed to produce. They are no condition for payments. (see 11.4).

HLS agreements are planned to be flexible and advice focussed. The way to accomplish this is to make the scheme prescriptions less rigid and give the POs more flexibility. The management options still have a set of prescriptions, but not all are compulsory. The details of the agreements will be drawn up in discussion between the farmer and the PO. In the negotiation the POs can decide which of the obligations for each option farmers have to meet and which are not relevant. He also sets the applicable Indicators of Success. To improve the advice Care and Maintenance Visits will be carried out. (DEFRA 2005d)

11.3 Application process and Farm Environment Plan (FEP)

Applicants will receive the combined ELS/HLS application documents. As a pre-requisite for ELS/HLS farmers must prepare a FER and building on that a Farm Environmental Plan (FEP). In practice, if both are carried out at the same time, the extra work for the FER is only some minor paperwork. The purpose of the FER is to:

- gather information for the HLS application:
 - assist with identifying land which is most suitable for positive management, and so help farmers to choose the relevant options;
 - provide DEFRA with information to assess in a consistent way which applicants should be offered an agreement;
- give a basis to monitor the success of the scheme.

(DEFRA 2005d)

The FEP is prepared in two phases: desk study and fieldwork. The desk study should make full use of already available environmental information, e.g. from the Historic Environment authority, environmental and conservation authorities and associations. With the results of the desk study, the field work can be more focussed and efficient. (DEFRA 2005e)

For the fieldwork, the whole farm needs to be walked. It is a very comprehensive habitat and landscape survey. The HLS Farm Environment Plan Guidance handbook contains a list of environmental features and habitats that must be recorded along with its condition and size. The 62 features are ordered in 10 groups such as field boundaries, grassland, historic environment, etc.. In the group field boundaries for instance, there are eight features:

hedgerow, species-rich hedgerow, line of trees, hedgebank, earthbank, stone- faced bank, stone wall and wet ditch. To each field and boundary, a feature and possibly a feature detail must be assigned. Its condition must be assessed in categories A, B and C and it must be recommended whether the feature should be maintained or restored. All information must be entered into a form, and a code for each feature on a map. (ibid.)

A landscape assessment must be carried out as part of the FEP. Both for DEFRA and the farmer it serves the purpose to determine appropriate management for landscape enhancement. The assessment is done with help of the classification of 159 English Joint Character Areas (JCA). The assessment is a comparison between the farm landscape and the “defined” landscape of the JCA, in which the farm is located: It is identified to which extend the JCA landscape characteristic is present in the surrounding area and on the farm, how the landscapes condition is and what management would be appropriate. (ibid.)

Based on the knowledge gained through desk study and field work, for all the seven objectives, statements to conditions, problems and recommendations must be given in a brief questionnaire. (ibid.)

Finally the farmers must choose their management options. To choose the options, the farmers should orientate themselves on the Targeting Statements that are issued for each JCA. The Targeting Statements are similar to the CS ones but basing on the Joint Character Areas they do not define areas where HLS is available, but define for the whole of England what must be achieved in each landscape. The statements are much more detailed and a wide range of local and national professionals were involved in their development (BOULDING 2005, oral). They contain regionalised targets, detailing for instance which landscape features and species are locally valuable and therefore should benefit from HLS options. Through this they give guidance as to the choice of management options. For DEFRA the Targeting Statements serve the purpose to assess the best applications. Hence, they are the most important benchmark for applicants. The targets are divided up into key targets and secondary targets. For the targets which the applications propose to fulfil, they will score five points per key target and two points per secondary target. Those applications that meet or exceed a point threshold will proceed in the application procedure. If the application does not address the relevant priority targets, it will be rejected. In this case it does not help if large amounts of management is included in the application, that does not address the priority targets. (DEFRA 2005f)

The FEP must be prepared by somebody who has experience with all the issues involved in the five primary objectives of HLS (see 11.1). It is expected, that this will often be done by an adviser. Farmers will be given a contribution towards the costs to prepare a FEP from DEFRA. The costs depend on the farm size and are determined in 12 progressive steps from £395 for farms <6 ha until £3350 for farms >3000 ha. (DEFRA 2005d) An average livestock farm in Somerset would fall into the category 51-149 ha and receive £1035 for the FER. An adviser from the Farming and Wildlife Advisory Group (FWAG, a big association for free conservation advice for farmers in Britain) would roughly need 3-4 days to complete the FER. Taking their fee of £340 per day, the reimbursement from DEFRA will roughly cover the costs. (THORNE 2005, oral).

After DEFRA has scored the applications with regard to the target statements, POs will visit the farmers with the most benefiting applications to discuss the agreement details. The parties agree upon which options suit the farmers economic situation, which prescriptions the agreement must contain and which Indicators of Success can be an orientation for the farmer. For this, the PO has to orientate himself on DEFRA's internal guidance notes which give more detailed information as to the management, than the HLS handbook does. These notes were

not yet available when this work was done. The POs have flexibility in choosing which of the there stated prescriptions and IoS are relevant for the aims that the agreement shall achieve and which are not necessary. (BOULDING 2005, oral)

11.4 Management options, Indicators of success and Care and maintenance Visits

There are 109 HLS options and supplements available and for another 48 ELS options farmers can receive payments under HLS if they have not yet chosen them for ELS. Highest priority is laid on maintenance of existing high quality sites, followed by restoration and then creation. Payments for the three aims differ not so much from each other, with especially maintenance and restoration often being rewarded equally. (DEFRA 2005d) This evidently takes into consideration, that for maintenance there is less extra work incurred then for restoration, but the sites have higher priority.

In the HLS handbook, for each management option there are aims, management requirements and the type of land for which options are eligible summarised. (ibid.)The management requirements are fairly vague, because the details shall be agreed between PO and land manager. In this way the scheme remains as flexible as possible and the POs can adjust agreements to a farms specific situation. When the agreement is drawn up, RDS advisers provide farmers with additional guidance notes to the relevant features (not to be mixed up with the Indicators of success). These are illustrated with pictures and give an easily understandable summary of some aspects of ideal condition, what to avoid and what to do.

The overall idea of the Indicators of Success is described in 11.2. At the time when this work was conducted (April to June 2005), the IoS were not yet ready. Only a draft example of IoS for two management options could be obtained which should not yet be passed around (see Appendix 3). The IoS will be illustrated in written and painted form so to display the aims easily understandable. (COLE 2005, oral) In the HLS handbook examples are given:

- Option: *Enhanced wild bird seed mixture*
Indicator of Success: *At full crop establishment, there should be between 75% and 100% cover of the sown species.*
- Option: *Maintenance of wet grassland for breeding waders*
Indicator of Success: *Between 5% and 25% of the field should have standing water between 1 March and 31 May*

(DEFRA 2005d, 39)

Farmers can apply for funding for capital work in addition to their annual options. There is a catalogue in the handbook of 101 capital items with payment rates, grouped in 16 chapters. The work will be set out in a capital works plan which can be prepared at any time during the life of the agreement. The money can be claimed once the work has been completed. (ibid.)

In exceptional cases, the proposals may need work outside the normal capital and annual options. For special projects there can be funding available. Examples given in the handbook were measures to increase the publics understanding of conservation works, costly restoration of historic buildings and archaeological features, and provision of hides for viewing wildlife. (ibid.)

In order to provide better advice for the HLS agreement holders, the RDS will visit them more often than before. Ideally Care and Maintenance Visits shall be done once a year, but at least every three years. In the past, for CS only very few visits were done. Some agreement holders never saw any RDS staff after the agreement had started. When this work was prepared, there was not yet detailed information on the care and maintenance visits available.

They are meant to be supportive and will address any possible problems the farmers have with the agreement. It is also thought to check on the basis of the IoS to which extend agreements are achieving its aims and whether the management would need any change. It is not meant to control if the agreement holders comply with the prescriptions. The responsibility for this rests with another authority. DEFRA does not plan to delegate the care and maintenance visits to free conservation advisers. (SMITH 2005, oral)

12 Issues relating to both ELS/OELS and HLS

12.1 Funding

The obtainable information on the financing were not satisfactory and not always all figures were existing and available. Especially the financial political decisions could not be analysed and details regarding modulation were not found. To roughly convert pound sterling (£) into Euro (€), the £-figure must be multiplied with 1.5.

The finance planning for agri-environment schemes relates to the seven years lasting finance periods of the EU. The current period lasts from 16th Oktober 1999 to 15th Oktober 2006. The sums the government is ready to pay on measures covered by the Regulation 1257/99 is complemented by a 50% EU contribution (5% of the total British agri-environment measures is in Objective 1 areas and is co-financed at the rate of 75% (DEFRA 2005i)). Works that are not covered by the Regulation 1257/99 must be solely state aided. In England this applies for one-off capital works, which can be applied for in HLS. (PICK 2005, oral). The expenditure plan for agri-environment provides for steadily growing spending with £83.6 mil. in 2000 and £153.5, £169.2 and £183.8 mil. from 2004 to 2006 (DEFRA 2005h). However, though the finance plan provided for £153,5 mil. in 2004, this sum was exceeded and a total of £194.3 mil. was spend. Devided by the total of 9.177.000 hectare of agriculturally used land in England, the sum amounts to £21.13/ha, about 31.5€/ha. The additional money came from other ERDP schemes which underspend their budget. From the £194.3 mil. £77.5 mil. come from the EU, £78.1 are UK exchequer matched funding and £38.7 mil. are state aided. (PICK 2005). The total expenditure for the ERDP will sum up to around £2 billion for 2000-2006 (BOULDING 2005, oral). Of this the share of the agri-environment schemes is £961 mil., which is approximately 50%. (for the ERDP agri-environment means all the in this work described schemes and the Organic Farming Scheme). (DEFRA 2005h)

In its press release at the launch of the scheme in March 2005, the Government proposed to spend more money on agri-environment after 2006: The expenditure is expected to reach more than £300 mil. per year within the next few years. (BOULDING 2005, oral). Deducting the £183.8 mil. planned expenditure for 2006 from this, it roughly amounts to £117 mil. per year additional funding for new ES agreements.

To compare the figures with Germany, on average in the period from 2004 – 2006, each year a total of 762 mil.€ is to be spend (expenses with and without co-financing). Per hectare agriculturally used land, this is 44.4€. (SRU 2002, 103)

The basis for the spending after 2006 will be a new EU Rural Development Regulation which is negotiated at the moment. It will provide for the same measures and concerning the funding it will be more detailed then the 1257/99. It will specify the sums available with the total amount of money and the shares of each Member State. The expenditures will be devided up into three axis: agri-environment, socio-economic and rural communities measures. Presently (middle of June) the shares of the axis are: AE: 25%, SE 30% and RC 45%. This is only a preliminary state of discussion and may change in further negotiations. If the government

wants to fulfil its expressed expectation to bring 80% of agricultural land in England into ELS within the next few years, it would need a share of the agri-environment measures on the rural development expenditures of 30%. (BOULDING 2005, oral)

It is uncertain how many of the future applications can be financed. Firstly, the uptake of the schemes can only be forecasted. The money for the old schemes and for ES comes from the same post. So, a lot of money will only be available for ES applicants as CS and ESA agreements terminate and the funding is set free. Secondly, if the share of agri-environment measures on the rural development measures is less than 30%, the UK does not receive enough money to co-finance all the required spending. A solution to this would be that the government pays more than can be co-financed from the EU. But in DEFRA this is not seen to be very likely. (BOULDING 2005, oral) Thirdly there is no set share between ELS/OELS and HLS. Two reasons make it likely that the Government would rather spend scarce funding on making all applicants get into ELS/OELS than to keep a high share of HLS: The first reason is that the public might measure DEFRA on its above mentioned 80%-aim. The second is that the government has said, that the scheme is “eligible to all farmers”. Others interpreted this in the way that “it is guaranteed that all can enter and be paid”. If this is public perception, then the Government will probably be reluctant to close ELS for applicants.

12.2 Administration, payments, checks and penalties

Like all ERDP schemes, ES is administered by nine regional offices of the Rural Development Service (RDS). For the local care and supervising there are a number of local RDS offices, on average one in each big county.

As with all ERDP schemes, in addition to the management the farmers commit themselves to, they have to abide to some requirements over the whole farm:

- the Standards of Good Agricultural Practice, which consist of 12 national regulations;
- the maintenance of existing rights of way
- eight basic verifiable standards of positive management.

Calculation of payments is layed down in Regulation (EC) No 1257/99, art. 24. They must be paid annually and calculated on the basis of profits forgone, additional costs of the commitment and an incentive.

The HLS payments are not depending on the Indicators of Success and farmers do not breach their agreement if they do not achieve the indicated objectives (BOULDING 2005, oral).

The agreement holders have to submit a claim for the payments of the previous season each year. On capital works they can claim at any time once they have carried out the work. (DEFRA 2005b, c)

The application of checks and penalties is layed down in Regulation (EC) No 817/2004, section 6. The Regulation provides for administrative and on-the-spot checks. They shall cover all commitments from different schemes. Each year, 5% of the agreement holders must be subject to an on-the-spot check. Administrative checks shall be exhaustive and include cross-checks with other schemes.

The controlling is called Compliance Monitoring and is carried out by the Rural Payment Agency (RPA). Concerning these checks there was no detailed information available. The 5% of farms to be controlled every year will be chosen on a random basis and on a risk assessment basis. Farms with a lot of schemes on their land and those where irregularities have been found in previous checks are regarded to have a higher risk to breach the agreements and will be subject to controls. (COLE 2005, oral)

Farmers would breach their agreement if they are found to:

- have declared an incorrect area of eligible land or incorrect number of points;
- do not follow the agreed management requirements or the Good Farming Practice;
- remove their FER features.

Depending on the severity of the breach, it may result in that future payments are withheld, that money that is already payed is reclaimed and in serious cases a penalty of up to 10% of the payment made is imposed. The agreement may be terminated and the farmer may be banned from entering into a new ERDP scheme for two years. (DEFRA 2005b)

12.3 Monitoring

At the time the work was conducted, there was no definite information concerning the monitoring available from DEFRA. The following relates to a preliminary draft contract that firms which were interested to bid for the monitoring, received and was obtained orally from Nigel Boatman at the Central Science Laboratories.

The Monitoring will be devided into four modules.

In the first part, the opinions of participants and non-participants on the scheme will be established. Points to look at will be:

- reasons for participation/non-paticipation;
- awareness of the schemes objectives and environmental issues in general;
- opinion on application process, options, payments and advice;
- factors which options were chosen;
- the way in which the management affects the participants business;
- the way in which other schemes that participants are in are affected.

The second part looks at the uptake:

- which character have the farms in terms of farm type, size, geography and ownership;
- have they transferred from a former agri-environment scheme;
- which options have how high an uptake.

Part three concerns the environmental outcome. It is again split up into four sub-parts:

1. Evaluation of the process and outcome of drawing up the FERs and FEPs. For this purpose, field visits will be made.
2. For a sample of farms in ELS a landscape and wildlife assessment will be made before the agreement (other than the FEP, the FER does not include an asesment, it is only a description). This enables to monitor and assess the change at a later time. This later monitoring is not part of the contract.
3. Gathering of opinions of stakeholders that were involfed in the development of the scheme. This will be done with a questionnaire. They will be given the results of the participants questioning, part one of this monitoring, and asked their opinion. This step is included here, because from right in the beginning, the ministry wanted to involve all relevant stakeholders and this is the continuation of that process.
4. The potential environmental outcome will be modelled. On the basis of the uptake of the options, it will be established what the possible benefit was. With this it will be scored to what extend the objectives then might have been achieved.

The fouth part is a wholistic appraisal as to the overall achievement of the scheme.

In addition to the above monitoring, the Royal Society for the Protection of Birds (RSPB) was bidding for a contract for surveying birds on ES farms. Very probably, there will be further outcome monitoring for species and landscape. (WINSPEAR 2005, oral)

13 Comments on the scheme

The author built up his opinion by numerous interviews with farmers, advisers and RDS staff. To judge the following assumptions, it must be reminded that no agreement is yet in place and many details are not yet available.

The Environmental Stewardship will be assessed by judging whether the scheme has the qualities to successfully incorporate the recommendations from the Curry Commission and the Review of the agri-environment schemes. These recommendations were for ELS

- to be comprehensive and addressing a wide range of environmental objectives
- but to be simple and easy understandable for applicants,
- reasonable to administer,
- eligible for all farmers
- and reaching a high uptake.

For HLS the recommendations comprised

- to have less restrictive and more flexible,
- locally adaptable,
- advice focussed agreements,
- more efficient targeting
- and to be outcome orientated.

For both, the overall funding was demanded to be increased and awareness campaigns and promotion among farmers were called for.

13.1 The Entry level Scheme/Organic Entry Level Scheme

Comprehensiveness: Looking at the wide range of options the scheme is very comprehensive. However, the pilot monitoring (BOATMAN et al. 2004) proved that farmers do not use the whole range of options, but rather choose a limited number of those which are easiest to include in their work routine. The high potential comprehensiveness makes it necessary that the applicants take a lot of time to familiarize themselves with the scheme. This brings about a reduction of simplicity.

Simplicity: It can be assumed from the nature of the ELS that the idea of creating a simple scheme works. The FER is a simple instrument, options are the same all over England, farmers are helped with the option choice by regional bulletins and all necessary information is in one handbook. It must be mentioned that for simplicities sake recommendations of the pilot monitoring were not followed and environmental objectives were compromised: It was renounced to include targeting and obligations regarding the choice of the management options. However, the completion of the FER, the large range of options and the comprehensive handbook is too much for some farmers and the scheme brings about a lot of paperwork. Some have problems with completing the application and the FER alone and must ask for assistance. The pilot monitoring gives some hints that farmers perceived the scheme

very differently with regard to the administration efforts. When asked about advantages, 32% stated that they liked the simplicity. 20% of them felt that the bureaucracy was the most negative point. (BOATMAN et al. 2004) The scheme is not *very* simple, but taken into account its remit, it is a fair compromise.

Understandability: Despite the intended simplicity, many farmers have difficulties understanding the scheme. They receive information through the booklet and numerous information meetings held locally by the RDS. Nevertheless many farmers call FWAG and ask them fairly simple questions. This may be because for many farmers with ELS it is the first time they get in touch with an ERDP scheme and they are not switched on to the principle.

Administration costs: The administration is simple. It includes merely to check points and area figures of the incoming applications, to send out acceptance letters, to pay the agreement holders and to control compliance of 5% of them. ELS works without negotiation of the agreements, visits to doublecheck FER, point score and area. No advice is provided regarding the management and payment is delivered on a flat rate basis. All this simplifies the administration but compromises the effectiveness. During the development process the RSPB wanted to make the scheme more effective for environmental gain. The idea was to pay farmers more if they could allocate more points on their land. They also wanted to restrict the choice of management options in order to diversify the implemented works and to direct them to those areas where they would achieve meaningful benefits (BJORCK, 2005, ORAL). The refusal to take on board these suggestions was a concrete example for a compromise in favour for a slim administration. This would have made the administration too complicated. However, despite the simplicity of the scheme there is a great need for personal information and farmers do need basic advice. To provide this requires a lot of resources, at least by telephone.

Uptake: Certainly it is not possible to make definite forecasts regarding the uptake. The fact that in many farm situations the ELS management does not bring about very much extra work and is therefore easy money, makes it likely that in present harsh economic times many farmers will want to enter. Active co-operation with farming organisations during the development and good experience with the pilot scheme make optimistic, too.

The principle: ELS is an innovative idea. The management demand is relatively shallow, so no high environmental performance can be expected. However, to the protection of declining but not yet rare species, to the maintenance of landscape value and to resource protection it will contribute. The rising spending for ELS through modulation money from the first pillar of the CAP is a positive re-direction of subsidies from economically efficient but “wildlife-empty” landscapes into landscapes which are harder to farm as they are richer on valuable features. This must be appreciated even though it is only a small contribution.

It may be worthy of discussion whether it is good that farmers in all landscapes can take part in ELS and whether the voluntary targeting with the non-binding guidance notes are sufficient. It is a well known fact that with programmes which are not clearly restricted on particular habitats or features, many farmers are paid for measures in landscapes where these works achieve not the least improvement. However, the voluntary targeting can be expected to be quite successful, not only because it gives the applicants a valuable support with the large number of options, but also because many farmers are willing to implement beneficial options on their land. The fact that targeting is voluntary makes the scheme more agreeable for the farmers. Nevertheless, if it turns out, that the voluntary principle does not work, it should be considered to make the targeting binding.

An important advantage of that the scheme is eligible for all farmers is the chance to raise awareness for environmental issues among many more farmers than were ever approachable with the old targeted CS and ESA schemes. This chance must be taken advantage of through careful communication from DEFRA to the “new farmers”.

13.2 The Higher Level Stewardship

Flexibility: It is very likely that agreements with well reasoned restrictivity and high flexibility will have the farmers approval. The high degree of liberality of the POs appears to be very progressive. One main difference to the old schemes is that CS and ESA handbooks define the management to a much higher degree than in HLS. This is probably because the HLS handbook with its wide range of options would become too thick and RDS staff wants to provide applicants only with the details for the options relevant to them. The exact management requirements shall be determined only later when the agreement is negotiated. The disadvantage of this principle is, that neither farmers nor free conservation advisers have clear indication whether or not the options can be incorporated into their business. With CS the management requirements were given in the handbook so detailed that, FWAG advisers state, they did work out the management with the farmer and DEFRA drew up the agreement almost without alteration. Now FWAG advisers feel passed over and claim that farmers are not well served with the new way. Nevertheless, the principle seems very promising and time will show how farmers react.

Advice: As with the old Countryside Stewardship, there is advice given in three different circumstances with HLS. The advice before the application with drawing up the Farm Environmental Plan is given by non-state conservation advisers such as FWAG, different conservation organisations, local authorities or private consultancies. The advice in connection with drawing up the agreements in discussion with the farmers and the supportive care and maintenance visits is carried out by the RDS.

The pre-application advice starts with explaining the potential applicants the details of the scheme and with assessing whether the habitats and species on the farm are relevant to the local HLS targeting and whether it would be worthwhile to apply. If farmer and adviser agree to apply, the adviser prepares the Farm Environment Plan. Then the adviser considers with the farmer, which management options are suitable to the farm and where they should be placed. They are marked on an options map and a field data sheet. At last the hectares or meters which each option would cover, and the money the farmer would get, are to be detailed.

This relatively detailed application is then checked by a Project Officer from the RDS, and the final agreement is drawn up in discussion between the farmer and the RDS Officer.

It appears to be a sensible system. Through the personal advice it can be reacted upon the farmers` and the landscapes` situation. It is good that the remit of the pre-application is not with the RDS but done by an independent adviser, because the farmers are often more willing to accept advice by independent organisations, who they perceive to work on behalf of the farming community. FWAG for instance claim, that they have a much better personal relationship with the farmers, than the RDS officers. Probably, this factor increases the uptake of the scheme. In addition, it improves the farmers` understanding of the objectives behind the work options, and that may make the implementation more effective. However, if advisers feel that they work on behalf of the farmers, they could try to satisfy their clients and get as much as possible out of the scheme for the least possible effort (TREHAINE 2005, oral). Therefore it is positive, that the final agreement is drawn up between the RDS adviser and the farmer.

Compared with CS, the care and maintenance visits will be increased. This is certainly good because it will intensify the farmers' understanding and help to optimise the management.

Outcome orientation: The idea of this is not totally new, but for DEFRA it is the first time to try it. Good is that the outcome is defined. CS did this too, but here it is done more insistently, in the way that the Indicators of Success are an integral part of the agreement, and better illustrated. The payment does not depend on the outcome, a step which would bring about considerable administrative efforts and was never attempted. (BOULDING 2005, oral)

Targeting: The targeting is a further improvement to the practice used for CS. Most relevant is that the basis of the Joint Character Areas is more detailed with a lot of local knowledge incorporated. However, it was admitted that the Targeting Statements were drawn up under time pressure and they may need to be adjusted. (BOULDING 2005, oral) Although the target statements give information on which conservation works should best be carried out in each JCA, they do not provide for a direction of measures them with regard to biogeographic requirements of migrating corridors and population islands of target species.

13.3 Issues relating to both schemes

Funding: One very important point is the doubled funding increase within the next years. If this will lead to a higher uptake, especially in HLS, synergetic effects for the environment can be expected. This is because more positively managed land in close proximity increases the extent of valuable habitat and at a certain degree populations may profit exponentially.

Accomplishing objectives: It is difficult to measure the schemes on their objectives at this stage. ELS aims much on enhancement, and this must surprise. The old ESA was failing to enhance much land, because the main uptake was in the lower tiers. Now, most of the ELS options are not very demanding either and hence, not too high a result should be expected. If HLS will be a little bit better than CS, it will reach its objectives.

Introduction process: When the ES was launched at the 3rd March, start and timing were not trouble-free. The scheme had been prepared under great time pressure and the new computer system caused major problems. It is likely that agreements for both schemes will start six weeks late (BOULDING 2005, oral). Almost all the pre-filled maps and forms the farmers were sent, were false. They were generated from another authority, the Rural Payment Agency and they obviously did not talk much to the RDS. A lot of information was not available from DEFRA. In late May the management prescriptions, Indicators of Success and guidances on Care and Maintenance Visits were not fully developed, no draft agreement was yet available and only in April online application forms were ready. In addition, the scheme was launched shortly after the CAP reform, so that the whole subsidy system had changed. This led to that the farmers mixed up the ES with the Single Payment Scheme. It would have been good to give the ES half a year more forward planning.

Stakeholders opinion: The RSPB was closely involved in developing the schemes. They are broadly happy with the developing process and the result. Their contribution was among others the research findings concerning the management options. Especially the general idea of the broad and shallow ELS scheme and the success orientation of the HLS has their approval. They did not feel that the farmers side was stronger represented than theirs. (BJORK 2005, oral) The farmers' representatives, the National Farmers Union, the Country Landowner Association and the Tenant Farmers Association are content with ES. Especially the ELS has their approval because it means simple bureaucracy and easy money for farmers.

14 Conclusion:

The Environmental Stewardship shows clearly that the Government takes the challenge of conserving the beauty and wildlife of the countryside seriously and has recognized that the future of farming is not only the production of food but also the care for the product landscape. With the ESL, in England it is the first time that a scheme with comprehensive list of positive management options, yet a simple structure, is open to all farmers without area limitation - and that an uptake of 70-80% is expected. The HLS shows the approach of a comprehensive, well targeted, flexible and efficient scheme.

It must be emphasized that the scheme is not a shabby compromise torn apart by different lobby groups. On the whole it is a successful outcome, drawn up by specialists and does not attract any major criticism from any side. With redoubled funding, reviewed options and modern agreements it can be expected to bring about good environmental performance. Hope for growing environmental awareness is appropriate if ELS achieves high uptake among farmers who so far were not switched on to such issues. The outcome orientation is a suspenseful experiment and may be developed further with this trial. Flexibility and advice focus sounds advanced, and a sensible equilibrium between independent advice and state advice has been found. The understandability must be improved, especially in the beginning of the scheme until most farmers have comprehended the system.

From the German perspective, this must appear as a major innovative step forward to a sustainable and responsible farming, where subsidies are justified through real performance. It is desirable that other European countries follow the English approach and use and improve the principle of Environmental Stewardship.

Resources

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- DEFRA, 2002c: Countryside Stewardship Targeting Statement Somerset. Information for applicants and advisers, 10 ppg, Crown Copyright.
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- DEFRA, 2003d: Higher Level Environment Stewardship Design Document. 27 ppg.
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- DEFRA, 2004b: Environmental Stewardship: An Introduction Note for Staff and Stakeholders. Crown Copyright.
- DEFRA, 2005a: The Somerset Levels and Moors. Date: 22.04.2005.
<http://defra.org.uk/erdp/schemes/esas/stage1/somerset.htm>
- DEFRA, 2005b: Entry Level Stewardship Handbook Terms and conditions and how to apply. 113 ppg, Crown Copyright.
- DEFRA, 2005c: Organic Entry Level Stewardship Handbook Terms and conditions and how to apply. 159 ppg, Crown Copyright.
- DEFRA, 2005d: Higher Level Stewardship Handbook Terms and conditions and how to apply. 120 ppg, Crown Copyright.

- DEFRA, 2005e: Higher Level Stewardship: Farm Environment Plan Guidance Handbook. 124 ppg, Crown Copyright.
- DEFRA, 2005f: Environmental Stewardship Targeting Statement 2005 JCA 145 Exmoor. Crown Copyright.
- DEFRA, 2005g: Environmental Stewardship Guidance Focusing on Results. 2 page leaflet. Crown Copyright.
- DEFRA, 2005h: England Rural Development Programme 2000-2006 Executive Summary. Annex 3 (finance plan). Available on www.defra.gov.uk.
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- COLE, C., 2005: team leader of Scheme Advice and Strategic Delivery Team in RDS, Nottingham, phone talk in May.
- PICK, J., 2005: Policy adviser on agri-environment in DEFRA, London, phone talk in June.
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- THORNE, B., 2005: Group leader of the Farming and Wildlife Advisory Group (FWAG) in Somerset, former regional leader of FWAG Southwest, Taunton, Several conversations in April and May.
- WINSPEAR, R. 2005: Agricultural adviser in the RSPB, Sandy, phone talk in May.

Appendix

Appendix 1: Entry Level Stewardship management options and points

Some options are summarized in one line, a few details are left out. The table is taken from the ELS Handbook (DEFRA 2005b, 34f). The details of the management are described there, too.

Option	Unit	Points
Options for boundary features		
Hedgerow management (on both sides of hedge/on one side)	100m	22/11
Enhanced hedgerow management	100m	42
Stone-faced hedgebank management on both sides/on one side	100m	16/8
Ditch management/half ditch management	100m	24/8
Combined hedge-ditch management (with the three different types of hedge management)	100m	38/28/56
Stone wall protection and maintenance	100m	15
Options for trees and woodland		
Protection of in-field-trees – on arable land	tree	12
Protection of in-field-trees – on grassland	tree	8
Maintenance of woodland fences	100m	4
Maintenance of woodland edges	ha	380
Options for historic and landscape features		
Take archaeological features currently on cultivated land out of cultivation	ha	460
Reduce cultivation depth on land where there are archaeological features	ha	60
Management of scrub on archaeological features	ha	120
Archaeological features on grassland	ha	16
Options for buffer strips and field margins		
2m/4m/6m buffer strips on cultivated land	ha	300/400/400
2m/4m/6m buffer strips on intensive grassland	ha	300/400/400
Buffering in-field ponds in improved grassland	ha	400
Buffering in-field ponds in arable land	ha	400
Options for arable land		
Field corner management	ha	400
Wild bird seed mixture	ha	450
Wild bird seed mixture on set aside land	ha	85
Pollen and nectare flower mixture	ha	450
Pollen and nectare flower mixture on set aside land	ha	85
Over-wintered stubbles	ha	120
Beetle banks	ha	580
Skylark plots	plot	5
Conservation headlands in cereal fields	ha	100
Conservation headlands in cereal fields with no fertilisers or manure	ha	330
6m uncropped cultivated margins on arable land	ha	400
Options to encourage a range of crop types		
Under sown spring cereals	ha	200
Wild bird seed mixture in grassland areas	ha	450
Pollen and nectare seed mixture in grassland areas	ha	450
Cereals for whole crop silage followed by over-wintered stubbles	ha	230

Brassica fodder crops followed by over-wintered stubbles	ha	90
Options to protect soils		
Management of high erosion risk cultivated land	ha	18
Management of maize crops to reduce soil erosion	ha	18
Options for lowland grassland outside the Less Favoured Areas		
Take field corners out of management	ha	400
Permanent grassland with low inputs	ha	85
Permanent grassland with very low inputs	ha	150
Management of rush pastures	ha	150
Mixed stocking	ha	8
Options for the uplands (Less Favoured Areas)		
Field corner management	ha	100
Manage permanent in-bye grassland with low inputs	ha	35
Manage in-bye pasture and meadows with very low inputs	ha	60
Management of rush pasture	ha	60
Enclosed rough grazing	ha	35
Moorland and rough grazing	ha	5
Management plans		
Soil management plan	ha	3
Nutrient management plan	ha	2
Manure management plan	ha	2
Crop protection management plan	ha	2

Appendix 2: Higher Level Stewardship, selection of management options with payments

This table is given for overview purpose and shows only a selection of the total of 109 options and supplements. Those which are not relevant for the north of Germany are left out. Some options are summarized in one line. The table is taken from a bulletin attached to the HLS Handbook (DEFRA 2005c). The details of the management are described in the Handbook.

Option	Unit	Payment
Hedgerow options		
Maintenance of hedgerows of very high environmental value	100m	£27
Woodland options		
Restoration/creation of traditional orchards	ha	£250/£190
<i>Another 14 options are left out here</i>		
Historic options		
Arable reversion by natural regeneration	ha	£500
Crop establishment by direct drilling (non-rotational)	ha	£70
Maintaining high water levels to protect archaeology	ha	£240
Maintenance of designed/engineered water bodies	ha	£295
Maintenance/restoration of traditional water meadows	ha	£350/£350
Arable options		
Floristically enhanced grass margins	ha	£485
Enhanced wild bird seed mix plots (rotational or non-rotational)	ha	£475
Fallow plots for ground nesting birds (rotational or non-rotational)	ha	£360
Unharvested fertilizer-free conservation headlands (rotational)	ha	£440
Reduced herbicide, cereal crop management preceding over-wintered stubble and a spring crop (rotational)	ha	£195
Fodder crop management to retain or re-create an arable mosaic	ha	£150
Cultivated fallow plots or margins for arable flora as an enhanced set aside option (rotational or non-rotational)	ha	£80
Fallow plots for ground nesting birds as an enhanced set aside option	ha	£80
Reduced herbicide, cereal crop management preceding enhanced set-aside	ha	£140
Unharvested, fertilizer free conservation headlands preceding enhanced set aside	ha	£400
Low input spring cereal to retain or re-create an arable mosaic	ha	£250
Cultivated fallow plots or margins for arable flora (rotational or non-rotational)	ha	£440
Resource protection options		
Arable reversion to unfertilized grassland to prevent erosion or run-off	ha	£280
Arable reversion to grassland with low fertiliser input to prevent erosion or run-off	ha	£210
In-field grass areas to prevent erosion or run-off	ha	£350
Preventing erosion or run-off from intensively managed improved grassland	ha	£280
Seasonal livestock removal on grassland with no input restriction	ha	£40
Nil fertilizer supplement	ha	£55
Grassland options		
Maintenance/restoration/creation of species rich semi-natural grassland	ha	£200/£200/£280
Maintenance/restoration/creation of wet grassland for breeding waders	ha	£335/£335/£355
Maintenance/restoration/creation of wet grassland for wintering waders and wildfowl	ha	£255/£255/£285
Maintenance/restoration/creation of semi-improved or rough grassland for	ha	£130/£130/£210

target species		
Enhanced buffer strips on intensive grassland	ha	£590
Supplement for hay-making	ha	£75
Raised water level supplement	ha	£80
Inundation grassland supplement	ha	£85
Moorland and upland rough grazing options		
Maintenance/restoration of moorland	ha	£40/£40
Creation of upland heathland	ha	£60
Maintenance/restoration of rough grazing	ha	£80/£80
Shepherding supplement	ha	£5
Seasonal livestock exclusion supplement	ha	£10
Moorland re-wetting supplement	ha	£10
Supplement for management of heather, gorse and grass by burning, cutting or swiping	ha	£7
Access provision		
<i>Nine options are left out here</i>		
Lowland Heathland options		
Maintenance of lowland heathland	ha	£200
Restoration of heathland from neglected sites/from forestry areas	ha	£200/£200
Creation of heathland from arable or improved grassland/worked mineral sites	ha	£450/£150
Inter-tidal and coastal options		
Maintenance/restoration of coastal saltmarsh	ha	£30/£30
Creation of inter-tidal and saline habitat on arable land/on grassland/by unmanaged breach or regular inundation	ha	£700/£500/£150
Maintenance/restoration of sand dunes	ha	£140
Creation of coastal vegetated shingle and sand dunes on arable land/grassland	ha	£320/£200
Supplement for extensive grazing on saltmarsh	ha	£70
Saltmarsh livestock exclusion supplement	ha	£40
Wetland options		
Maintenance of ponds of high wildlife value < 100 sq m	Pond	£90
Maintenance of ponds of high wildlife value > 100 sq m	Pond	£180
Maintenance/restoration/creation of reedbeds	ha	£60/£60/£380
Maintenance/restoration/creation of fen	ha	£60/£60/£380
Maintenance/restoration of lowland raised bog	ha	£150/£150
Wetland cutting/grazing supplement	ha	£350/£200
Additional supplements		
Supplement for control of invasive plant species	ha	£60
Bracken control supplement	ha	£35
Supplement for small fields	ha	£35
Supplement for difficult sites	ha	£50
Supplement for group applications	ha	£10

Appendix 3: HLS Indicators of success and Management prescriptions

To your attention: this is only a preliminary draft. Because at the time of completion of this work, the IoS were still in the process of the last corrections, the person who gave this draft to the author did not want the source to be mentioned.

AR3 Enhanced wild bird seed mix plots (rotational or non-rotational)

Aims and objectives.

These areas are managed to provide a sustained source of food during winter months for targeted wild birds. A specified wild bird seed mixture or seed-bearing crop is sown and established in field margin strips and/or blocks within arable fields.

Indicators of success

1. At full crop establishment, there should be between 75% and 100% cover of the sown species.
2. At full crop establishment, cover of bare ground should be between 5% and 25% of the plot.
3. At full crop establishment, there should be no more than 5% cover of undesirable species xxxx .
4. The plot should provide sustained seed production, throughout the winter and early spring
5. The target bird species (xxxx) should be regularly seen utilising the plots.

Management prescriptions to be applied.

1. Establish the following seed mix (xxxx) at xx kg/ha .
2. To maintain seed production, re-sow every year/two years
3. Wild bird seed mix areas should not be used for access, turning or storage. Do not graze.
4. Control undesirable species under guidance provided by your DEFRA adviser.
5. Treatments applied to adjacent land must not affect or encroach on the wild bird seed mix areas.
6. When the mixture is being re-established, removal of the plant cover and cultivation must not take place before 15 March .

Option GR3 - Maintenance of species-rich, semi-natural grassland

Aims and objectives.

This option is targeted at the maintenance and protection of areas of species-rich grassland. By continuing with the current management the grassland will be conserved. The importance of species-rich grassland is recognised by the UK Biodiversity Action Plan (BAP). The option can also contribute to protecting valued landscapes and archaeology, and the promotion of good soil conditions.

Indicators of success

1. Maintain or increase the extent of the feature(s) of interest within the grassland, as identified in the Farm Environment Plan.
2. The Soil Phosphate Index should be 0 or 1 .
3. At least 2 of the high-value indicator species (see table below) should be frequent , and 2 occasional , in the sward.
4. Cover of wildflowers (excluding undesirable species but including rushes and sedges) in the sward should be between 30% and 90% .

5. Cover of invasive trees and shrubs (<i>sycamore, blackthorn, cotoneaster, bramble, xxxx</i>) (<i>excluding bog myrtle, juniper, creeping willow, xxxx</i>) should be less than 5% .
6. In all years, recorded rare or scarce species <i>xxxx</i> should remain present.
7. Cover of species indicating waterlogging (<i>tufted hair-grass, rushes, large sedges, common reed, reed canary-grass, reed sweet-grass, xxxx</i>) should be less than 20% .
8. Localised bare ground around rabbit warrens should cover less than 5m × 5m .
9. The soil pH should be between 5.5 and 7 .
10. Where the site is an SSSI, the habitats should meet, or be recovering towards, the favourable condition targets, in particular the diversity and/or abundance of characteristic species in guidance from EN.

Management prescriptions to be applied.

1. Ploughing, sub-surface cultivation and reseedling are not permitted. Chain harrowing or rolling are permitted except between 1 April and 30 June .
2. Manage the sward by grazing and/or cutting to achieve a sward height of between 2cm and 10cm in October/November .
3. Well-rotted farmyard manure may be applied at a maximum rate of 12.5 tonnes/ha/yr (but not within 6 metres of a watercourse). Other organic or inorganic fertilisers are not permitted.
4. Supplementary feeding is confined to the feeding of hay/straw/forage roots/concentrates/mineral blocks in fields xxyy. Feeders and troughs should not be used, feeding sites should be moved regularly and always avoid historic features. Creep feeding of young stock is permitted.
5. Control undesirable species such as (<i>creeping thistle, spear thistle, curled dock, broad-leaved dock, common ragwort, common nettle, xxxx</i>) so that their cover is less than 5% of the area.
6. Field operations and stocking must not damage the soil structure or cause heavy poaching, but small areas of bare ground on up to 5% of the field are acceptable. Take particular care when the land is waterlogged.
7. Maintain existing drains in working order.
8. Do not top, roll or harrow more than 30% of the total grassland area in any one year (and always leave a minimum of 5% tussocks/longer grass).